

Statement of Legal and Factual Basis for The HON Company

Registration No: 50766

Date: October 1, 2001

I Introduction

1. Facility Information

Permittee

The HON Industries
414 East Third Street
Muscatine, IA 52761

Facility

The HON Company
11200 Old Stage Road
Chester, VA 23831

Responsible Official

Mr. Jim Fuller
V.P./General Manager
(804) 796-3100

Contact person

Ms. Sonja Edkin
Safety & Environmental Manager
(804) 796-3116

AIRS Identification Number: 51-041-0133

2. Source Description - Based on the description provided below in Table 1, the SIC code given, 2522 Office Furniture, Except Wood.

Table 1. -- 2522 Office Furniture, Except Wood

Establishments primarily engaged in manufacturing office furniture, except furniture chiefly of wood.
Establishments primarily engaged in manufacturing safes and vaults are classified in Industry 3499.

Benches, office: except wood
Bookcases, office: except wood
Cabinets, office: except wood
Chairs, office: except wood
Desks, office except wood
File drawer frames: except wood
Filing boxes, cabinets, and cases except wood
Furniture, office: except wood
Modular furniture systems, office except wood
Panel furniture systems, office: except wood
Partitions, office: not for floor attachment-except wood
Stools, office: rotating-except wood
Tables, office: except wood
Wall cases, office: except wood

Raw materials including coated and uncoated steel are received and fabricated into furniture components. Various components are welded or glued in assembly operations. The uncoated components are cleaned in three stage washers and dried in gas fired ovens before transfer to one of the coating lines. Coating is accomplished through manual electrostatic spray application. Overspray is collected on a baffle system and either reformulated for reuse or shipped to the paint manufacturer for reformulation or is shipped off site as hazardous waste. Overspray not collected on the baffles passes through dry polyester filters before exhausting through the coating line stacks. In addition, three lines operate with small dip tanks. Gas fired ovens set the coating. Final assembled products are packaged and shipped.

The HON Company was originally owned by F. H. Lawson which was considered an existing source of which only Lines 1 and 2 existed.

3. Compliance History

A review of the inspection/compliance files for this facility appears to have no history of noncompliance. As, the files contain no letters of noncompliance, no notice of violations, and no consent orders entered into with this facility.

II Emissions Inventory

The source submitted attachments with the permit application labeled as "Attachment to Annual Actual Air Pollutant Emissions" sheet nos. 20, 21, and 22. Sheet nos. 20, 21, and 22 are for each of the respective emission units:

Sheet no. 20, EU1-EU3, Spray Coating Lines.

Sheet no. 21, EU7, Fugitive Welding.

Sheet no. 22, EU6, Fugitive Conveyor Hook Blast System.

The emissions estimates provided indicate compliance with existing limitations on potential to emit (PTE). The emissions inventory from the AIRS system is included. Initially, the emissions summary report indicated that the source was not in compliance with its facility wide PM, PM₁₀, and NO_x emissions condition in their 10/5/98 permit. It was discovered that a math error had been made with the emission factors for natural gas and therefore, causing the emission limits to be underestimated. The facility is in compliance with the amended permit.

III Applicable Requirements

1. Emission Unit Applicable Requirements

Each of the units listed in the significant emissions units table (**Table No. II B. 1**) are regulated in a facility wide NSR permit issued on June 14, 2001 (which includes Line 5 to be constructed and operated). The listing of applicable requirements are as follows:

Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
EU1		<u>Line 1 - File Line</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray (1) Dry-off/Bake		37.5 gals of coating mixture/hr

Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
	16 & 17	Oven		2.5 mmbtu/hr
	5	(2) Spray Booths Spray Paint Booth no. 1 contains 4 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	6 & 7	Spray Paint Booth no. 2 contains 4 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	6 & 7 (Booth 2)	(1) Paint Dip Tank (1) Air Makeup Heater		2'6"x2'6"x2'6" volume 3.5 mmbtu/hr
EU2	19, 21, 22 & 23	<u>Line 2 - File Line</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
		(1) Dry-off/Bake Oven		4.4 mmbtu/hr
	9	(2) Spray Paint Booths Booth no. 1 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	Each gun approx. 10 gals/hr
	10 & 11	Booth no. 2 contains 4 spray guns (1) Paint Dip	Ransburg Electrostatic REA-4 (65 kV)	Each gun approx. 10 gals/hr

Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
	10 & 11 (Booth 2)	Tank (1) Air Makeup Heater		2'6"x2'6"x2'6" volume 3.5 mmbtu/hr
EU3		<u>Line 3 – Lateral Line</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
	38, 42, & 43	(1) Dry-off Oven		4.5 mmbtu/hr
		(4) Spray Paint Booths		
	29	Booth No. 1 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	Each gun approx. 10 gals/hr
	30	Booth No. 2 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	32	Booth No. 3 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	33	Booth No. 4 contains 2 spray guns	Ransburg Electrostatic REA-4 (65 kV)	each gun approx. 10 gals/hr
	39, 40, & 41	(1) Bake Oven		4.5 mmbtu/hr

Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
		(2) Air Makeup Heaters		3.5 mmbtu/hr per each
EU4		<u>Line 4 –</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
	47 & 48	(1) Dry-off Oven	Ransburg Electrostatic REA-90	2.5 mmbtu/hr
	49 & 50/ Booth 1 51 & 52/ Booth 2	(2) Spray Booths each contains 4 spray guns		each gun approx. 10 gals/hr
	49, 50, 51, & 52	(1) Paint Dip Tank		2'6"x2'6"x2'6" volume
	53 & 54	(1) Bake Oven		3.5 mmbtu/hr
		(1) Air Makeup Heater		2.78 mmbtu/hr
EU5		<u>Line 5 -</u> Coating Operations of Steel Furniture, Manual Electrostatic Spray		37.5 gals of coating mixture/hr
	58 & 59	(1) Dry-off Oven	Ransburg Electrostatic REA-4 (65 kV)	2.5 mmbtu/hr
	60 & 61/ Booth 1, 62 & 63/ Booth 2	(2) Spray Booths each contains 4 spray guns		each gun approx. 10 gals/hr
	60, 61, 62,	(1) Bake Oven		3.5 mmbtu/hr

Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity*
	& 63 64 & 65	(1) Air Makeup Heater		2.78 mmbtu/hr
EU6		(1) Conveyor Hook Blast System with a cyclone of a 99.0% control efficiency for PM and a 99.5% control efficiency for PM10	Jet Wheelblast	810 lbs of hooks/hr

- The inclusion of values for equipment rated capacities as listed above, are for informational purposes and are not applicable requirements.

Permit Dated June 14, 2001 - The source took a throughput limitation on Lines 4 & 5 to avoid application of the "case by case" Mact - 112(g) of the clean air act when issuing the October 5, 1998 facility wide NSR permit. The applicable requirements from the permit conditions are listed below.

- Particulate emissions from the metal furniture coating application systems (Line # 1, 2, 3, 4, and 5) shall be controlled by a metal baffle filter system. The metal baffle filter system shall be provided with adequate access for inspection.
(9 VAC 5-80-10, Condition no. 3 of the NSR permit issued on 6/14/01)
- Particulate emissions from the blasting of conveyor hooks shall be controlled by a cyclone with a 99.0% control efficiency for PM and a 99.5% control efficiency for PM10. The cyclone shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, Condition no. 4 of the NSR permit issued on 6/14/01)
- Volatile organic compound emissions from each of the paint dip tanks for Lines # 1, 2, and 4 shall be controlled by having a cover on top of the dip tank when not in use. The dip tank and cover shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, Condition no. 5 of the NSR permit issued on 6/14/01)
- Volatile organic compound (VOC) emissions from the metal furniture coating application systems (Lines #1, 2, 3, 4, and 5) shall be controlled by high-solids coatings and a metal baffle filter system. In addition, the metal furniture coating application systems for Lines # 3, 4, & 5 will control volatile organic compound (VOC) emissions by the use of manual electrostatic spray guns each with a transfer efficiency of a minimum of 60%

(9 VAC 5-80-10 H and 9 VAC 5-40-4640, Condition no. 6 of the NSR permit issued on 6/14/01)

7. Volatile organic compound (VOC) emissions from cleaning lines of equipment shall be minimized by minimization of the quantity of volatile organic compounds used.
(9 VAC 5-40-4630 C, Condition no. 7 of the NSR permit issued on 6/14/01)
8. Volatile organic compound (VOC) emissions from cleaning or purging a system shall be minimized by adjustment of production schedules to minimize coating changes.
(9 VAC 5-40-4630 C, Condition no. 8 of the NSR permit issued on 6/14/01)
9. At any one time, there shall be no more than 4 guns in operation per line (Lines 1, 2, 3, 4 and 5).
(9 VAC 5-40-4630 C, Condition no. 9 of the NSR permit issued on 6/14/01)
10. The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations. All test ports shall be located as required by the appropriate test method.
(9 VAC 5-50-30 F, Condition no. 10 of the NSR permit issued on 6/14/01)
11. The daily throughput of VOC to each of the metal furniture coating application systems (Lines # 1 and 2) shall be no more than 1,800.0 pounds per day. The throughput of VOC to each of the metal furniture coating application systems (Lines # 1 and 2) shall be no more than 240 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-170-160, Condition no. 11 of the NSR permit issued on 6/14/01)
12. The daily throughput of VOC to each of the metal furniture coating application system (Line # 3) shall be no more than 1,680.0 pounds per day. The throughput of VOC to metal furniture coating application system (Line #3) shall be no more than 37.9 tons VOC per year (including VOCs from the paint and thinning solvent), calculated as the sum of each 12 consecutive month period.
(9 VAC 5-170-160, Condition no. 12 of the NSR permit issued on 6/14/01)
13. The daily throughput of VOC to each of the metal furniture coating application systems (Lines # 4 and 5) shall be no more than 1,680.0 pounds per day. The throughput of VOC to each of the metal furniture coating application systems (Lines # 4 and 5) shall be no more than 67.2 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period. In addition, the combined throughput of VOC to the metal furniture coating application systems (Lines #4 and 5) shall be no more than 67.2 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-170-160, Condition no. 13 of the NSR permit issued on 6/14/01)
14. The heaters/burners of the dry-off ovens, bake ovens, and makeup air all consume no more than 419×10^6 cubic feet of natural gas or 4,567,000 gallons of liquid

petroleum gas per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-170-160, Condition no. 14 of the NSR permit issued on 6/14/01)

15. Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (Lines # 1 and 2) are limited to 3.0 lb VOC/gal less water as a daily average as delivered by the coating applicator.
(9 VAC 5-40-4630 A, Condition no. 15 of the NSR permit issued on 6/14/01)
16. Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (Lines #3, 4, and 5) are limited to 2.8 lb VOC/gal less water as a daily average as delivered by the coating applicator and shall be limited to 7.51 pounds of VOC per gallon of coating solids applied [0.90 Kg of VOC per liter of coating solids applied].
(9 VAC 5-40-4630 A, Condition no. 16 of the NSR permit issued on 6/14/01)
17. The volatile organic compound throughput associated with cleanup for operation of all of the metal furniture coating application systems (Lines # 1, 2, 3, 4, and 5) shall not exceed 2.1 tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-170-160, Condition no. 17 of the NSR permit issued on 6/14/01)
18. Compliance for Lines # 3, 4, and 5 with NSPS 40 CFR 60 Subpart EE shall be determined by an initial and monthly performance tests as specified in 40 CFR 60.313. Reporting and recordkeeping requirements including quarterly or semiannual reporting shall be as specified 40 CFR 60.315.
(9 VAC 5-50-20, Condition no. 18 of the NSR permit issued on 6/14/01)
(This was replaced with "Initial and Subsequent Performance Tests" as per 40 CFR 60.313 requirements D.(6)1 - D.(6)6 and the "Reporting and Recordkeeping" requirements D.(6)1&2.)
19. The following emissions (from coating - not inclusive of combustion emissions from oven burner) from the operation of each of the metal furniture coating application systems (Lines #1 & 2) shall not exceed the limits specified below:

Total Suspended			
Particulate	2.4 lbs/hr	5.2 tons/yr	
PM ₁₀	2.4 lbs/hr	5.2 tons/yr	
Volatile Organic			
Compounds	112.5 lbs/hr	1,800.0 lbs/day	240.0 tons/yr

Compliance shall be determined as stated in condition numbers 3, 5, 6, 9, 11, 14, 15, 24, 26, 27, 30, and AQP-2.

(9 VAC 5-50-260 and 9 VAC 5-50-180, Condition no. 19 of the NSR permit issued on 6/14/01)

20. The following emissions (from coating - not inclusive of combustion emissions from oven burner) from the operation of the metal furniture coating application system (Line # 3) shall not exceed the limits specified below:

Total Suspended Particulate	2.4 lbs/hr	0.9 tons/yr
PM ₁₀	2.4 lbs/hr	0.9 tons/yr
Volatile Organic Compounds	105.0 lbs/hr 1,680.0 lbs/day	37.9 tons/yr
Napthalene	4.4 lbs/hr	

Compliance shall be determined as stated in condition numbers 3, 6, 9, 12, 14, 16, 18, 24, 25, 26, 28 and 30. **(AQP-2 was streamlined as the listed condition no. 18 of the 6/14/01 NSR permit which refers to 40 CFR 60.313 performs the same function as AQP-2.)**
(9 VAC 5-50-260 and 9 VAC 5-50-180, Condition no. 20 of the NSR permit issued on 6/14/01)

21. The following emissions (from coating - not inclusive of combustion emissions from oven burner) from the operation of each of the metal furniture coating application systems (Lines # 4 and 5) shall not exceed the limits specified below. In addition, the combined emissions from Lines # 4 and 5 shall not exceed the limits specified below:

Total Suspended Particulate	2.4 lbs/hr	1.6 tons/yr
PM ₁₀	2.4 lbs/hr	1.6 tons/yr
Volatile Organic Compounds	105.0 lbs/hr 1,680.0 lbs/day	67.2 tons/yr
Xylene	15.4 lbs/hr	
Napthalene	4.4 lbs/hr	

Compliance shall be determined as stated in condition numbers 3, 5, 6, 9, 13, 14, 15, 18, 24, 25, 26, 28 and 30. **(AQP-2 was streamlined as the listed condition no. 18 of the 6/14/01 NSR permit which refers to 40 CFR 60.313 performs the same function as AQP-2.)**
(9 VAC 5-50-260 and 9 VAC 5-50-180, Condition no. 21 of the NSR permit issued on 6/14/01)

22. Cleanup emissions for operation of all of the metal furniture coating application systems (Lines #1, 2, 3, 4, and 5) shall not exceed the limits specified below:

Volatile Organic Compounds	17.6 lbs/day	2.1	tons/yr
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These emissions are derived from the estimated overall mass balance. Compliance shall be determined as stated in condition number 7, 8, 9, 17, and 30. (9 VAC 5-50-260 and 9 VAC 5-50-180, Condition no. 22 of the NSR permit issued on 6/14/01)

23. In addition to the emission limits listed in conditions 19, 20, 21 and 22 of this permit, facility-wide emissions shall not exceed the limits specified below:

Total Suspended Particulate	12.7	lbs/hr	7.7 ¹ tons/yr
PM-10	12.7	lbs/hr	7.7 ¹ tons/yr
Sulfur Dioxide	0.8	lbs/hr	3.7 ¹ tons/yr
Nitrogen Oxides (as NO ₂)	7.3	lbs/hr	32.0 ¹ tons/yr
Carbon Monoxide	1.0	lbs/hr	4.3 ¹ tons/yr
Volatile Organic Compounds	540.3	lbs/hr 8,644.2 lbs/day	243.0 ¹ tons/yr

*: The facility wide emissions limits listed in this condition does not include emissions from the units listed under condition no. 2 which has an asterisk beside them **(of the NSR permit issued 6/14/01 and the corresponding Title V permit Table No. II A.)**.

1: Annual facility wide emissions shall be determined monthly as the sum of each consecutive 12 month period.

(9 VAC 5-50-260 and 9 VAC 5-50-180, Condition no. 23 of the NSR permit issued on 6/14/01)

24. **For Lines 3, 4, & 5, The HON Company may use new paint formulations and solvents which will yield an uncontrolled emission rate of a new toxic pollutant or result in an increase of the uncontrolled emission rate of a toxic pollutant equal to or less than the exemption levels for toxic pollutants as determined by the exemption formulas listed under 9 VAC 5-80-11 I (or be permitted as such). This is provided the uncontrolled emission rate (or increase in the uncontrolled emission rate) of the toxic pollutant does not exceed 22.8 pounds per hour or 100 tons per year. In addition, this is provided the toxic pollutant emission limitations listed in conditions 20 and 21 are being met. If, any of the toxic pollutant emissions for Lines 3, 4, & 5 are above the exemption levels for toxic pollutants or above 22.8 pounds per hour or 100 tons per year or above the toxic**

pollutant limitations of conditions 20 and 21, a permit application must be submitted to the department for review before emission of the toxic pollutant shall commence.
(9 VAC 5-170-160, Condition no. 24 of the NSR permit issued on 6/14/01)

*** This is only a State Applicable Requirement.**

25. For Lines 4 & 5, the annual emissions of a single hazardous air pollutant (HAP) must be less than 10 tons/yr and any combination of HAPs must be less than 25.0 tons/yr. For Lines 4 & 5, if any single hazardous air pollutant is 10 tons/yr or more and/or any combination of HAPs is 25 tons/yr or more, a permit application shall be submitted for review.
(9 VAC 5-170-160, Condition no. 25 of the NSR permit issued on 6/14/01)
26. Current Material Safety Data Sheets (MSDS) shall be kept on site for each surface coating, solvent, and adhesive used in the facility for to demonstrate compliance with conditions 11, 12, 13, 15, 17, 18, 19, 20, 21, 22, 23, **24** and 25.
(9 VAC 5-170-160, Condition no. 26 of the NSR permit issued on 6/14/01)
*** The listed condition no. 24 is the only State applicable requirement the rest are federally enforceable.**
27. Visible emissions from each of the metal furniture coating application systems (Lines # 1 and 2) exhausts shall not exceed twenty (20) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-170-160 and 9 VAC 5-50-20, Condition no. 27 of the NSR permit issued on 6/14/01)
28. Visible emissions from each of the metal furniture coating application systems (Lines # 3, 4, and 5) exhausts shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). Visible emission evaluations shall be conducted on the spray booth exhausts, the dry-off oven, and the bake oven. The details of the tests shall be arranged with the Director, Piedmont Region. The permittee shall submit a test protocol at least thirty (30) days prior to testing.
(9 VAC 5-170-160 and 9 VAC 5-50-20, Condition no. 28 of the NSR permit issued on 6/14/01)
29. The permittee shall furnish written notification to the Director, Piedmont Region of:
 - a. The actual date on which construction was continued on the metal furniture coating application system (Line # 5) commenced within 10 days after such date.
 - b. The anticipated start-up date of the metal furniture coating application system (Line # 5) postmarked not more than 60 days nor less than 30 days prior to such date.
 - c. The actual start-up date of the metal furniture coating application system (Line # 5) within 10 days after such date.

- d. The anticipated date of performance tests of the metal furniture coating systems (Lines #3 and 5) postmarked at least thirty (30) days prior to such date.

Copies of written notification referenced in items a, b and c above to be sent to:

Chief
Air Enforcement Branch (3AT20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-170-160, Condition no. 29 of the NSR permit issued on 6/14/01)

- 30. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - a. Daily records demonstrating compliance with the requirements in Air Quality Program Policies and Procedures, Number AQP-4 from each of the metal furniture coating application systems (Lines #1, 2, 3, 4, and 5) along with the maximum number of spray paint guns used at any one time.
 - b. Monthly records demonstrating compliance with the requirements in 40 CFR 60.315 for Lines #3, 4, and 5.
 - c. **Records will be kept to demonstrate that all coatings and solvents used are exempt for toxic pollutants (as per the State Regulations) on an hourly and an annual basis except for any permitted toxic pollutants of which records will demonstrate these permitted emission limitations are being met. These records shall be performed and calculated monthly as the sum of each consecutive 12 month period. These records may be requested to be submitted to the department at any time at the department's discretion.**
 - * **The above is only state applicable.**
 - d. Records for Lines 4 and 5 will be kept for to demonstrate compliance with condition no. 25, to show that no single hazardous air pollutant (HAP) is 10 tons/yr or above and no combination of HAPs are 25 tons/yr or above. These records shall be performed and calculated monthly as the sum of each consecutive 12 month period. These records may be requested to be submitted to the department at any time at the department's discretion.

- e. Current Material Safety Data Sheets (MSDS) shall be kept on site for each surface coating, solvent, and adhesive used in the facility.
- f. Records demonstrating the average daily VOC emissions (in pounds/gallon of coating, excluding water, as delivered by the coating applicator) for each of the metal furniture coating application systems (Lines #1, 2, 3, 4, and 5).
- g. Monthly material balance of VOCs used at the facility, to include:
 - (a) Throughput of VOCs used in each of the metal furniture coating application systems (Lines #1, 2, 3, 4, and 5);
 - (b) Throughput of VOCs used in cleaning for Lines # 1, 2, 3, 4, and 5);
 - (c) Throughput of VOCs disposed of offsite;
 - (d) Calculation of emissions.
- h. Annual throughput of natural gas and liquefied petroleum gas calculated monthly as the sum of each consecutive 12 months.
- i. Total of the previous twelve months'.

These records shall be available on site for inspection by EPA and shall be current for the most recent five (5) years.
(9 VAC 5-50-50, Condition no. 30 of the NSR permit issued on 6/14/01)

36. This permit shall become invalid if construction of the proposed metal furniture coating application system (Lines #1, 2, 3, 4, and 5) is not commenced within eighteen (18) months of the date of this permit or if it is discontinued for a period of eighteen (18) months.
(9 VAC 5-80-10 K, Condition no. 36 of the NSR permit issued on 6/14/01)

40 CFR 60.312 NSPS Subpart E Standards of Performance for Surface Coating of Metal Furniture

Applicability

On May 14, 2001, October 5, 1990, and June 14, 2001, The HON Co. was issued permits to construct Line no. 1, Line no. 2, Line no. 3, Line no. 4 and 5 respectively to coat metal furniture. The construction of Line no. 3 and line no. 4 and proposed construction of line no. 5 for additional metal furniture made each of the coaters subject to Subpart EE of 40 CFR 60.310 because the construction occurred after the applicability date of November 28, 1990 of 40 CFR 60.310 (b)).

Standard

The standard for volatile organic compounds (VOC) under 40 CFR 60.312(a) states that "no owner or operator subject to the provisions of this subpart shall cause the discharge into the atmosphere of VOC emissions from any metal furniture surface coating operation in excess of 0.90 kilogram of VOC per liter of coating solids applied." The NSR permit

included conditions consistent with 40 CFR 60.312(a) which states: Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (Lines #3, 4, and 5) are limited to 2.8 lb VOC/gal less water as a daily average as delivered by the coating applicator and shall be limited to 7.51 pounds of VOC per gallon of coating solids applied [0.90 Kg of VOC per liter of coating solids applied]. **The 2.8 lb VOC/gal less water as a daily average as delivered by the coating applicator is equivalent to the 0.90 kg of VOC per liter of coating solids applied. It was placed in this condition as the state regulations has a VOC standard which is 3.0 lb VOC/gal less water as a daily average as delivered by the coating applicator; however, the NSPS standard is more strict and therefore, 2.8 was used instead.**

Condition 16 of the June 14, 2001 permit is the NSR condition that requires this standard to be met.

The NSPS **testing, recordkeeping, and reporting** requirement (as specified in 40 CFR 60.313) for line nos. 3, 4, & 5 was referenced in condition 18 of the June 14, 2001 permit which states the following:

Compliance for Lines # 3, 4, and 5 with NSPS 40 CFR 60 Subpart EE shall be determined by an initial and monthly performance tests as specified in 40 CFR 60.313. Reporting and recordkeeping requirements including quarterly or semiannual reporting shall be as specified 40 CFR 60.315.
(9 VAC 5-50-20)

The above condition was made into “initial subsequent performance tests” as per 40 CFR 60.313 requirements D.(6)1 – D.(6)6 and the “Reporting and Recordkeeping” requirements D.(6)1&2 as stated in the Title V permit. Only the applicable sections of 40 CFR 60.313 and 40 CFR 60.315 to the HON Co. were made into conditions.

Monitoring of emissions and operations:

The **monitoring** requirements for the affected facility as defined in 40 CFR 60.314 was not applicable to this facility as this facility does not use a capture system and an incinerator to comply with the NSPS standard. This facility only uses compliant coatings (high solids coatings) and in addition, a manual electrostatic spray gun which has a minimum transfer efficiency of 60%.

a. **Obsolete conditions from permits that can be removed**

The Part 70 regulations define specific inspection and entry requirements consistent with the issuance of a TITLE V permit. These requirements are described in General condition 14 of the Title V permit and are at least as stringent as the NSR requirements. Inclusion of these conditions would be redundant and the requirements have been overtaken by the Title V (Part 70) regulations.

Condition 37 of the June 14, 2001 permit is not being included as an applicable requirement in the Title V permit because it is redundant. General applicable requirement B.18.b. describes the requirements for transfer of ownership relative to the Title V permit.

The transfer of ownership requirements for the NSR permit are therefore inappropriate for inclusion in the Title V permit.

Condition 31 of the June 14, 2001 permit is not being included as an applicable requirement in the Title V permit because it refers to modification or revocation of the NSR permit and not the Title V permit.

- a. This permit may be modified or revoked in whole or in part for cause, including, but not limited to, the following:
 - i. Violation of any terms or conditions of this permit;
 - ii. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
 - iii. A change in any condition that requires either a temporary or permanent reduction or elimination of a permitted discharge; or
 - iv. Information that the permitted discharge of any pollutant poses a threat to human health, welfare, or the environment.

(9 VAC 5-170-160 and 9 VAC 5-80-10)

- 2. Generally Applicable Requirements - Certain conditions within existing NSR permits may be applicable to all newly constructed or modified equipment that receive a permit. Below is a listing of these conditions:

- a. In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:
 - i. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
 - ii. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-170-160)

- b. The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training and nature of training).

(9 VAC 5-170-160)

- c. A copy of this permit shall be maintained on the premises of the facility to which it applies.
(9 VAC 5-170-160)

These conditions are being retained in the Title V permit because 1) they are applicable requirements generally applied to all modified and newly constructed equipment permitted through the minor NSR permit program; 2) they have an impact on the prevention of excess emissions and therefore are not environmentally insignificant; and 3) they require recordkeeping and reporting that may be included in periodic monitoring requirements.

3. State-Applicable requirements from NSR Permit Conditions - The state applicable requirements associated with the June 14, 2001 NSR permit issued to this facility are as follows:

1. The following emissions from the operation of the metal furniture coating application system (Line # 3) shall not exceed the limits specified below:

Total Suspended Particulate	2.4 lbs/hr	0.9 tons/yr
PM ₁₀	2.4 lbs/hr	0.9 tons/yr
Volatile Organic Compounds	105.0 lbs/hr 1,680.0 lbs/day	37.9 tons/yr
Napthalene	4.4 lbs/hr	

Compliance shall be determined as stated in condition numbers 3, 6, 9, 12, 14, 16, 18, 24, 25, 26, 28, 30 and AQP-2.
(9 VAC 5-50-260 and 9 VAC 5-50-180)

* **Only the items in bold are the ones that are only state applicable. In addition, AQP-2 was streamlined as the listed condition no. 18 of the 6/14/01 NSR permit which refers to 40 CFR 60.313) performs the same function as AQP-2.**

2. The following emissions from the operation of each of the metal furniture coating application systems (Lines # 4 and 5) shall not exceed the limits specified below. In addition, the combined emissions from Lines # 4 and 5 shall not exceed the limits specified below:

Total Suspended Particulate	2.4 lbs/hr	1.6 tons/yr
PM ₁₀	2.4 lbs/hr	1.6 tons/yr
Volatile Organic Compounds	105.0 lbs/hr 1,680.0 lbs/day	67.2 tons/yr
Xylene	15.4 lbs/hr	

Napthalene 4.4 lbs/hr

Compliance shall be determined as stated in condition numbers 3, 5, 6, 9, 13, 14, 15, 18, 24, 25, 26, 28, 30, and AQP-2.
(9 VAC 5-50-260 and 9 VAC 5-50-180)

* **Only the items in bold are the ones that are only state applicable. In addition, AQP-2 was struck through as the condition no. 18 of the 6/14/01 NSR permit which references CFR 60.313 performs the same function as AQP-2.**

3. For Lines 3, 4, & 5, The HON Company may use new paint formulations and solvents which will yield an uncontrolled emission of a new toxic pollutant or result in an increase of the uncontrolled emission rate of a toxic pollutant equal to or less than the exemption level for pollutants as determined by the exemption formulas listed under 11 I (or be permitted as such). This is provided the uncontrolled emission rate (or increase in the uncontrolled emission rate) of the toxic pollutant does not exceed 22.8 pounds per hour or 100 tons per year. In addition, provided the toxic pollutant emission limit listed in conditions 20 and 21 are being met. If, any of the toxic pollutant emissions for Lines 3, 4, & 5 are above the exemption levels for the pollutant above 22.8 pounds per hour or 100 tons per year or above the emission rate limitations of conditions 20 and 21, a permit application must be submitted to the department for review before emission of the toxic pollutant shall commence. (9 VAC 5-170-160, Condition no. 24 of the NSR permit issued 6/14/01)
4. Current Material Safety Data Sheets (MSDS) shall be kept on site for each surface coating, solvent, and adhesive used in the facility for to demonstrate compliance with conditions 11, 13, 15, 17, 18, 19, 20, 21, 22, 23, **24** and 25. **This is the only state applicable requirement.**
(9 VAC 5-170-160, Condition no. 24 of the NSR permit issued 6/14/01)

Records shall be maintained to demonstrate that all coatings and solvents used are exempt for toxic pollutants (as per the State Regulations) on an hourly and annual basis. Records shall be maintained for any permitted toxic pollutants of which records shall demonstrate that permitted emission limitations are being met. These records shall be prepared and calculated monthly as the sum of each pollutant over the 12 month period. These records may be requested to be submitted to the department at any time at the department's discretion.
(9 VAC 5-170-160, Condition no. 30 c of the NSR permit issued 6/14/01)

6. If, for any reason, the permitted facility or related air pollution control equipment has or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, Piedmont Region within four (4) business hours of the occurrence. The portion of the facility which is subject to the provisions of **Rule 4-3 or 5-3 (toxics)** shall shut down immediately upon request of the DEQ. In addition, the owner shall provide a written statement, within seven (7) days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shutdown.

(9 VAC 5-20-180, Condition no. 33 of the NSR permit issued 6/14/01)

* **Only the items in bold is state applicable only.**

The above conditions are state applicable as they are subject to the State's Toxic Rule of which is not included under the SIP.

- a. Future Applicable Requirements - This source should be subject to the MACT for Surface Coating of Metal Furniture MACT (RRRR) as it appears this facility is similar to the typical processes in the preliminary industry characterization for Surface Coating of Metal Furniture from review of discussions on preparing for this MACT. The tentative date to finalize this MACT is 5/2002.
- b. Inapplicable Requirements - Lines 1 and 2 were not subject to 40 CFR 60 Subpart EE because they were constructed before November 28, 1980 but monitoring and recordkeeping requirements were as according to AQP-4 were used to help establish periodic monitoring for the non-NSPS coaters. The combustion equipment used in these two lines at this facility are natural gas/liquid petroleum gas (LPG) fired with the largest rated capacity being 4.5 mmbtu/hr. The largest pollutant emissions (NOx) resulted in emissions below 5 tons/yr which came from the largest mmbtu/hr unit (4.5 mmbtu/hr) which makes these units insignificant for purposes of Title V.

1 Standard Terms and Conditions

a. Facility Wide Conditions and Permit Terms

New source standard for visible emissions - The new source standard applies to the heaters used to provide heat to the various sections of the plant (i.e. office), EU10, EU11, EU12, and EU13. The time frame of when these insignificant sources were installed is unknown; however, even if these units are not grandfathered (existing) sources they would still not be required to obtain a permit as each unit's emissions would be below the new source permitting levels. As a result, they would only be subject to the existing source standard for visible emissions.

The new source opacity standard is not applied to Lines 3, 4, and 5 because it has an existing 5% opacity limit of which is BACT for these sources. The 5% opacity limit is more stringent than the new source standard.

4. General Permit Conditions
 - Recordkeeping and reporting
 - Failure/Malfunction Reporting
 - Permit Deviation Reporting
 - Severability
 - Duty to Comply
 - Need to Halt or Reduce Activity not a Defense
 - Permit Action for Cause
 - Property Rights
 - Duty to Submit Information
 - Duty to Supplement or Correct Application
 - Duty to Pay Permit Fees

Changes to Permits for Emissions Trading
Alternative operating scenarios
Inspection and entry requirements
Annual Compliance Certification
Reopening For Cause
Permit Availability
Transfer of Permits
Permit Expiration
Malfunction as an Affirmative Defense
Permit Revocation or Termination for Cause

2 Insignificant Activities

Table No. II A. Insignificant Emission Unit Inventory List				
Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity* (5-80-720 C.)
EU1b	One (1) water based partwasher and associated burner for File line no. 1	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	1.0 mmbtu/hr
EU2b	One (1) water based partwasher and associated burner for Flex line no. 2	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	1.0 mmbtu/hr
EU3c	One (1) water based partwasher and associated burner no.1 for Lateral line no. 3	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	4.0 mmbtu/hr
EU3d	One (1) water based partwasher and associated burner no. 2 for Lateral line no. 3	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	4.0 mmbtu/hr
EU4c	One (1) Partwasher and associated burner for line no. 4	5-80-720 A.,C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	2.0 mmbtu/hr
	One (1) Hot Water Heater			0.2 mmbtu/hr
EU5c	One (1) Partwasher and associated burner for Flex line no. 5	5-80-720 A., C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	2.0 mmbtu/hr
EU7	Hand and machine	5-80-720 C.2.	PM10, manganese	7,560.0 lb of MIG

Table No. II A. Insignificant Emission Unit Inventory List				
Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity* (5-80-720 C.)
	Welding with MIG wire and bronze rods		compounds, nickel compounds	wire/yr 1,250.0 lb of bronze rod /yr
EU8	Two (2) Lateral System Hot Water Heaters	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	0.2 mmbtu/hr
EU9	One (1) Plant Hot Water Heater	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	0.745 mmbtu/hr
EU10	One (1) Plant Heater for Front Office	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	0.225 mmbtu/hr
EU11	One (1) Plant Heater for Absolute Air Unit – Plant	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	5.2 mmbtu/hr
EU12	One (1) Plant Heater for Absolute Air Unit – Plant	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	5.2 mmbtu/hr
EU13	One (1) Plant Heater for Absolute Air Unit – Warehouse	5-80-720 C.2.	PM10, SO ₂ , NO ₂ , CO, VOC	5.2 mmbtu/hr

*: The inclusion of values for equipment rated capacities listed above are for informational purposes and are not applicable requirements.

**: All of the burners associated with the partwashers and the heaters listed in Table No. II A. burn natural gas or liquid petroleum gas (LPG).

19. Periodic Monitoring

The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement. This facility has 5 metal furniture coating lines, Lines 1, 2, 3, 4, and 5 as well as cleanup which require that periodic monitoring be applied. Periodic monitoring for these emissions units is being defined as follows:

Table 4. Periodic Monitoring for Lines 1, 2, 3, 4, and 5, Cleanup, fuel usage, and blasting paint off hooks.

<u>Limitation</u>	<u>Parameter</u>	<u>Monitoring</u>	<u>Recordkeeping</u>	<u>Reporting</u>
1) Particulate emissions from the metal furniture coating	Check to see if the filter does exist and	Check once a month.	Record once a month.	Semi-Annual Compliance

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application systems (Line #1, 2, 3, 4, and 5) shall be controlled by a metal baffle filter system. The metal baffle filter system shall be provided with adequate access for inspection.	its physical condition (i.e. clogged, no tears) and if the filter needs to be replaced.			Certification 5-80-110 F.2.a.
2) Particulate emissions from the blasting of conveyor hooks shall be controlled by a cyclone with a 99.0% control efficiency for PM and a 99.5% control efficiency for PM10. The cyclone shall be provided with adequate access for inspection.	Existence of cyclone and whether it is meeting its respective control efficiencies	Monthly material balance to demonstrate control efficiencies.	Record once a month.	Semi-Annual Compliance Certification 5-80-110 F.2.a.
3) Volatile organic compound emissions from each of the paint dip tanks for Lines #1, 2, and 4 shall be controlled by having a cover on top of the dip tank when not in use. The dip tank and cover shall be provided with adequate access for inspection.	Existence of covers On each paint dip tank.	Checked when a batch of coating mix is prepared.	Maintain record of results of equipment check.	Semi-Annual Compliance Certification 5-80-110 F.2.a.
4) Volatile Organic Compound emissions from the metal furniture coating application systems (Lines # 1, 2, 3, 4, and 5) shall be controlled by high-solids coatings and a metal baffle filter system. In addition, the metal furniture coating application systems for Lines #3, 4, & 5 will control volatile organic compound (VOC) emissions by the use of manual electrostatic spray guns each with a transfer efficiency of a minimum of 60%.	Use of high-solids coatings, check of filters, and use of an electrostatic spray gun to demonstrate a minimum of 60% transfer efficiency is being met as according to NSPS EE.	Review of current MSDS sheets monthly to verify if all coatings contain 60% or more nonvolatile compounds by volume. Check of filters for clogging or any tears. Verification of the use of an electrostatic spray gun.	Records as required by AQP-4 which requires the solids content of content as supplied (percent by volume), monthly records noting the physical condition of filters, records of use of an electrostatic spray gun as verified by monthly records of performance test performed as according to 40 CFR 60.313	Semi-Annual Compliance Certification 5-80-110 F.2.a.
5) Volatile Organic Compound emissions from cleaning lines of equipment shall be minimized by minimization of	Minimized use of VOCs by work practices (i.e. painting all metal	Records work practices used or type of cleaner used .	Maintain records of work practices used to minimize VOC quantity	Semi-Annual Compliance Certification 5-80-110 F.2.a.

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the quantity of volatile organic compounds used.	furniture pieces of same color at once before switching to another color or type of cleaner used.)	(cleanup solvent used as per AQP-4 or by production methods).		
6) Volatile organic compound (VOC) emissions from cleaning or purging a system shall be minimized by adjustment of production schedules to minimize coating changes.	Minimization of VOC emissions by production schedules (i.e. painting all metal furniture pieces of same color at once before switching to another color.)	Review of production schedule semi-annually noting minimization methods used (i.e. colors used in painting for each of the lines.)	Maintain annual records of review of production schedules as required in AQP-4.	Semi-Annual Compliance Certification 5-80-110 F.2.a.
7) The daily throughput of VOC to each of the metal furniture coating application systems (Lines #1 and 2) shall be no more than 1,800.0 pounds per day. The throughput of VOC to each of the metal furniture coating application systems (Lines #1 and 2) shall be no more than 240 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period.	Daily and annual (based on a 12 month consecutive period) paint usage along with thinning solvents for each line (Lines 1 & 2).	VOC throughput calculated daily and monthly.	Maintain records as according to AQP-4.	Semi-Annual Compliance Certification 5-80-110 F.2.a.
8) The daily throughput of VOC to the metal furniture coating application system (Line #3) shall be no more than 1,680.0 pounds per day. The throughput of VOC to metal furniture coating application system (Line #3) shall be no more than 37.9 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period.	Daily and annual (based on a 12 month consecutive period) paint usage along with thinning solvents for Line 3.	VOC throughput calculated daily and monthly.	Maintain records as according to AQP-4.	Semi-Annual Compliance Certification 5-80-110 F.2.a.
9) The daily throughput of VOC to each of the metal furniture coating application systems (Lines #4 and 5) shall be no more than 1,680.0 pounds per	Daily and annual (based on a 12 month consecutive period) paint usage along with	VOC throughput calculated daily and monthly.	Maintain records as according to AQP-4.	Semi-Annual Compliance Certification 5-80-110 F.2.a.

day. The throughput of VOC to each of the metal furniture coating application systems (Lines #4 and 5) shall be no more than 67.2 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period. In addition, the combined throughput of VOC to the metal furniture coating application systems (Lines #4 and 5) shall be no more than 67.2 tons per year (including VOCs from the paint and thinning solvent), calculated monthly as the sum of each consecutive 12 month period.

thinning solvents for each line (Lines 4 & 5).

10) The heaters/burners of the dry-off ovens, bake ovens, and air makeup heaters for Line nos. 4 and 5 shall consume no more than 419.0 x10⁶ cubic feet of natural gas or 4,567,000 gallons of liquid petroleum gas (lpg) per year, calculated monthly as the sum of each consecutive 12 month period.

Annual fuel usage as the sum of each consecutive 12 month period.

Monthly fuel usage.

Records will be kept monthly.

Semi-Annual Compliance Certification 5-80-110 F.2.a.

11) Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (Lines # 1 and 2) are limited to 3.0 lb of VOC/gal less water as a daily average as delivered by the coating applicator.

Compliance with Virginia's standard of 3.0 lb of VOC/gal less water as a daily average as delivered by each coating applicator for each metal furniture coating application system.

An initial EPA method 24 will be performed on each coating as applied (i.e. includes thinning solvents). Subsequent performance of EPA reference method 24 will be performed on each coating as applied upon formulation change of coating as applied.

Records of the initial EPA method 24 will be performed on each coating as applied along with the monthly records noting any formulation changes for each coating as applied. If there is any formulation change to each of the coatings as applied for each metal furniture coating application system, there must

Semi-Annual Compliance Certification 5-80-110 F.2.a.

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be records of performance of the EPA reference method 24 along with the results. Subsequent records will be according to AQP-4.

12) Volatile organic compound emissions from finishing coatings used in each of the metal furniture coating application systems (Lines #3, 4, and 5) are limited to 2.8 lb VOC/gal less water as a daily average as delivered by the coating applicator and shall be limited to 7.51 pounds of VOC per gallon of coating solids applied [0.90 Kg of VOC per liter of coating solids applied].

Compliance with NSPS standard of 0.90 Kg of VOC per liter of coating solids applied [2.8 lb of VOC/gal less water as a daily average as delivered] by each coating applicator for each metal furniture coating application system.

An initial and subsequent performance test will be performed as according to 40 CFR 60.313 as noted in D(6)1-6 under initial and subsequent performance test

Records will be kept as according to AQP-4 and 40 CFR 60.315 as noted in D.(6)1&2 under reporting and recordkeeping.

Quarterly report if the standard under 40 CFR 60.312 is exceeded and Semi-Annual Compliance Certification 5-80-110 F.2a.

13) The volatile organic compound throughput associated with cleanup for operation of all of the metal furniture coating application systems (Lines #1, 2, 3, 4, and 5) shall not exceed 2.1 tons per year, calculated monthly as the sum of the consecutive 12 month period.

Daily and annual (based on a 12 month consecutive period) cleanup usage for each metal furniture coating application system.

Amount of clean up solvents used on a daily basis from each coating application system will be recorded daily along with the cleanup solvent identification number. The daily amount will be used to calculate the monthly amount used as the sum of the consecutive 12 month period.

Records will be kept as according to AQP-4.

Semi-Annual Compliance Certification 5-80-110 F.2.a.

14) Compliance with 40 CFR 60 Subpart EE shall be determined by an initial and monthly performance tests as specified in 40 CFR 60.313. Reporting and recordkeeping requirements including quarterly or semiannual reporting shall be as specified 40 CFR 60.315.

Compliance with the standard in 40 CFR 60.312.

Performance Testing as 40 CFR 60.313.

Records will be kept as according to 40 CFR 60.315.

Semi-Annual Compliance Certification 5-80-110 F.2.a.

The above table describes the periodic monitoring requirements for all of the applicable requirements for significant sources in the NSR permit issued on June 14, 2001. The requirements are generally contained in the permit issued on June 14, 2001 but some conditions have been developed to ensure that the periodic monitoring requirements of 9 VAC 5-80-110 E.2. have been met.

For item 1 in the above table (condition 3 of the permit), a condition had to be added to the permit as none existed in the current NSR permit for periodic monitoring of the baffle filter system to evaluate if the filter system was in good working order on a continuing basis.

Item 2 - again no periodic monitoring condition was in the current NSR permit to determine if the cyclone is meeting its respective control efficiencies.

Item 3 - no periodic monitoring condition existed to determine if the covers are in place when the paint dip tank is not being utilized; therefore, one was added. In addition, the use of a cover is considered BACT for this type of source.

Item 4 - same comment as in Item 1.

Items 5 & 6 - no additional periodic monitoring needed.

Items 7-9 - A These conditions are used for periodic monitoring of the emission limitations conditions for Lines 1, 2, 3, 4, & 5. The hourly emission limitations will be determined by daily use of coatings and diluent divided by the hours of operation of each of the respective lines. The hourly emission limits were established based on the hourly capacity of each of the paint spray guns. Therefore, if each of the spray paint guns are operated at capacity, or below and have no more than 4 guns in use at any one time, there should not be a violation of the hourly emission rates. Calculations have been included as attached along with the respective emission factors used. The annual emission limits established for the spray paint guns are based on the expected coating and diluent usage on an annual basis of which is limited in terms of the annual VOC throughput limit of the permit. Calculations have been included along with the emission factors to demonstrate that if The HON Co. processes all that is permitted or less, then the emission limits will not be violated. Therefore, as long as the throughput limit is not violated, there is no possibility that the criteria pollutant emission limits will be violated. Recordkeeping demonstrating compliance with the throughput limit can be used to demonstrate compliance with the criteria pollutant emission limits, therefore throughput limits satisfy the periodic monitoring requirement.

Item 10 - The hourly criteria pollutant emission limits established are based on the hourly capacity of the fuel burners for the ovens and makeup air heaters. Therefore, if the fuel burners/heaters for the ovens and makeup heaters are operated at capacity, or below, there should not be a violation of the hourly emission rates. Calculations have been included attachment along with the respective emission factors to demonstrate how the limits were obtained. The annual emission limits established for criteria pollutants are based on the fuel limit contained in the current NSR permit. Regarding these pollutants, the fuel throughput is the factor that determines emission rates. Calculations have been included in the attached along with the emission factors to demonstrate that if The HON CO. processes all that is permitted or less, then the emission limits will not be violated. Therefore, as long as the throughput limit is not violated, there is no possibility that the criteria pollutant emission limits will be violated. Recordkeeping demonstrating compliance with the throughput limit can be used to demonstrate

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compliance with the criteria pollutant emission limits, therefore throughput limits satisfy the periodic monitoring requirement.

Item 11 - A condition was added to clarify compliance and to spell out periodic monitoring a little more clearly. It already existed in the current NSR permit under the emission limitations for Lines 1, 2, 3, 4 and 5 in the form of the State's AQP-2.

Item 12 - Additional conditions were added to clarify compliance and to spell out periodic monitoring a little more clearly. It already existed in the current NSR permit under condition 18 of the current NSR permit for Lines 1, 2, 3, 4 and 5 in the form of 40 CFR 60.313 and 40 CFR 60.315.

Item 13 - This condition has been broken out into individual conditions for periodic monitoring for Lines 3, 4, and 5.

The 5% opacity standard applied to Metal Furniture Coating Application Systems (Lines 3, 4, and 5) is a state BACT requirement for VOC operations. The source will be required to log the appearance of the vented emissions from the coating operation and institute corrective action when visible emissions exist. Depending on whether the corrective action is successful the source will be required to perform a method 9 to demonstrate compliance or to log the corrective action taken and return to the weekly monitoring of emissions opacity.

1. Streamlined conditions

Conditions 20 and 21 from the June 14, 2001 NSR permit to not include compliance with the State's AQP-2 as required by the State's existing regulations for Metal Furniture Coating Application Systems. The reason these conditions were streamlined for Lines 3, 4, and 5 is that the same information is required under 40 CFR 60.313 for these lines and is required to be performed monthly. Condition 10 from the June 14, 2001 NSR permit was streamlined, as it was determined this condition would be covered under the facility wide conditions and general requirements pertaining to the annual compliance certification (Part III B. 15). It was surmised that if any compliance stack testing needed to be performed a test port would need to be in place.

2. Public Participation

The proposed permit was placed in the Richmond Times Dispatch on July 11, 2001 for public notice. The thirty day public comment period ended at the close of business day on August 9, 2001 and no comments were received.

EPA Comments were received in an e-mail to DEQ-Piedmont Regional Office (PRO) from Dave Campbell, of EPA Region III. The following are DEQ-PRO's response to EPA's comments regarding the draft Title V operating permit for The HON Company.

EPA Comment #1:

"1. Comment: You should amend Condition 4 on page 12 regarding visible emissions evaluations for lines EU1 and 2 to indicate that a Method 9 test shall be performed if any visible emissions are observed and not if above-normal is not practically enforceable. This change would make this condition consistent with your other VE conditions. [I recognize that the limit is higher for these units, however, they should not experience uncorrectable VE situations very often.]

VA DEQ's Response #1: Periodic Monitoring and Recordkeeping Condition no. 4 on page 12 was amended as follows:

The emissions from each of the metal furniture coating application systems (EU 1 and 2) Lines #1 and 2 shall be observed visually at least once each month for at least a brief time period during normal operations to determine if they have **any** visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having **any** visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

EPA Comment #2:

"2. Comment: Also, Condition 9 on page 18 provide HAP emission limits for EU 4 and 5. We are making no judgement if the limit is practically enforceable for purpose of limiting PTE at this time. In other words, we are not assessing if adequate throughput limitations exist to make this limit practically enforceable. Let the permittee beware.

VA DEQ's Response #2: An e-mail was sent to The HON Company to inform them of this situation.